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7 **UNITED STATES DISTRICT COURT**
8
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 CASE NO: 2:14-CR-202

12 Plaintiff,
13 v.
14 FERNANDO LARA-MARTINEZ,
15 Defendant.

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17 **UNOPPOSED MOTION FOR PRE-PLEA**
PRESENTENCE INVESTIGATION REPORT &
PROPOSED ORDER

18 COMES NOW, Benjamin C. Durham, and hereby moves the court to order a pre-plea presentence
19 investigation report. The defendant may have a prior conviction that would impact his sentencing
20 exposure and plea negotiations, and that could result in a sentencing disparity of several years in prison.
21 The presentence report will promote judicial economy and assist in the resolution of this case.
22 Undersigned counsel respectfully requests an order that the Probation Department conduct a pre-plea
23 presentence investigation report. Counsel has spoken with Assistant United States Attorney Amber
24 Craig, who does not oppose this request.

25 DATED this 19th day of August, 2015.

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28 /s/ Benjamin Durham
BENJAMIN C. DURHAM ESQ.
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601 S. 10th St.
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5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

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8 UNITED STATES OF AMERICA,

CASE NO: 2:14-CR-202

9 Plaintiff,

10 **ORDER**

v.

11 FERNANDO LARA-MARTINEZ,

12 Defendant.

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14 IT IS HEREBY ORDERED that the Probation Department will prepare a pre-plea presentence
15 investigation report for Defendant Fernando Lara-Martinez.

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17 DATED this 21st day of August, 2015.

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DISTRICT COURT JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that I served the foregoing MOTION on all parties via electronic filing on the 20th day of August, 2015.

/s/ Cristina Flores

An employee of Benjamin Durham Law Firm